



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

PETER K. KIJEWSKI, PhD

*Plaintiff,*

v.

Teachers Insurance and Annuity Association of  
America, TIAA Trust, N.A.<sup>1</sup>  
The Vanguard Group, Inc.,  
Pershing LLC,  
Maureen A. Dunn, Esq.,  
Mitchell Y. Cohen, Esq.,  
Marie F. Kijewski, PhD

*Defendants.*

No. 1:25-cv-01779-JAV-SDA

**LETTER-MOTION  
DEPOSITION REQUEST**

Dear Judge Jeannette A. Vargas & Judge Stewart D. Aaron:

See my appended DEPOSITION REQUEST to be forwarded to Paul Cowie, TIAA CFP, Portfolio Advisor WMA, since December 31, 2015.

Proposed return date: June 30, 2025. If SDNY Court changes the return date, I will notify Paul Cowie.

The DEPOSITION REQUEST will be uploaded to TIAA archive, email attachment to Paul Cowie and UPS Express Mail delivery at Paul Cowie's business address.

June 3, 2025, proposed ORDER DCECF No. 45 I included notice of Paul Cowie DEPOSITION.

The sole and exclusive author of the provided DEPOSITION will be Paul Cowie. Paul Cowie will need to inform himself about SDNY DEPOSITION rules.

See [Paul Cowie, TIAA CFP, Portfolio Advisor WMA, Summary Statement and Signature Page](#) Paul Cowie needs to complete.

I will email Paul Cowie written DEPOSITION to Pro Se Intake Unit on receipt from Paul Cowie.

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<sup>1</sup> See DCECF No. 35.

DEPOSITION REQUEST approved:

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
**HON. JEANNETTE A. VARGAS**

\_\_\_\_\_  
**HON. STEWART D. AARON**

Return date approved: \_\_\_\_\_

Alternate return date: \_\_\_\_\_

June 9, 2025

Respectfully submitted,

/s/ Peter Kijewski

Peter K. Kijewski, PhD

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ENDORSEMENT: To the extent Plaintiff intends the instant Letter Motion to be notice of deposition, such Letter Motion does not comply with Federal Rule of Civil Procedure 30(b). Moreover, any such notice or other discovery requests need not be filed to the ECF docket. Plaintiff is reminded that there is a free legal clinic that provides limited-scope legal services to self-represented litigants. Further information is available on the Court's website at <https://nysd.uscourts.gov/attorney/legal-assistance>. The Clerk of Court is respectfully requested to terminate the motion at ECF No. 50.

SO ORDERED.

Dated: June 13, 2025

